

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF LOUISIANA**

UNITED STATES OF AMERICA	*	CRIMINAL NO. 09-223
v.	*	SECTION: "C"
GERALYN MOORE	*	Violations: 18 U.S.C. §1029(a)(2)
	*	18 U.S.C. § 1343
	*	
	*	
	*	

**FACTUAL BASIS**

If this case were to proceed to trial, the United States would prove beyond a reasonable doubt, through credible testimony and reliable evidence, the following facts, which support the charges in the Superseding Bill of Information:

***The defendant committed access device fraud when she used a  
Discover Card that did not belong to her to make 13 unauthorized purchases.***

From on or about April 2008 through August 2008, Discover Card with the number xxxx-xxxx-xxxx-5473 belonged to M.G. and did not belong to the defendant, **GERALYN MOORE**.

Beginning on or about April 1, 2008 and continuing through on or about August 31, 2008, in the Eastern District of Louisiana, the defendant, **GERALYN MOORE**, did knowingly

and with intent to defraud, use one or more unauthorized access devices, as defined by Title 18, United States Code, Section 1029(e) (1) and (3), specifically, a Discover Card with the number xxxx-xxxx-xxxx-5473 belonging to M.G., to obtain goods and services having a value of \$1,000 or more, specifically \$2,852.82. The defendant's use of the Discover Card affected interstate commerce.

The defendant used the Discover Card to make the below unauthorized purchases:

#	Date	Vendor	Amount
1.	5/03/08	DirecTV	\$ 129.36
2.	5/08/08	Flowers Direct	\$ 157.62
3.	5/14/08	Geico	\$ 350.98
4.	5/31/08	Entergy	\$ 402.95
5.	6/03/08	Seventh Avenue	\$ 353.75
6.	6/03/08	Uniform Advantage	\$ 256.84
7.	6/06/08	Uniform Advantage	\$ 72.95
9.	6/13/08	Scrubbshopper.com	\$ 91.90
9.	6/13/08	Uniform Advantage	\$ 161.90
10.	6/17/08	DirecTV	\$ 108.00
11.	6/24/08	Entergy	\$ 182.95
12.	6/30/08	Entergy	\$ 404.45
13.	6/30/08	Geico	\$ 179.17
<b>Total</b>	<b>\$ 2,852.82</b>		

**The defendant committed wire fraud in connection with her use of the Discover Card.**

From on or about April 2008 through August 2008, a Discover Card with the number xxxx-xxxx-xxxx-5473 belonged to M.G. and did not belong to the defendant, **GERALYN**

**MOORE.**

Beginning on or about May 2008 and continuing through on or about July 2008, in the Eastern District of Louisiana, the defendant, **GERALYN MOORE**, did knowingly and willfully devise and intend to devise a scheme and artifice to defraud and to obtain money, property and services from Discover Card Financial Services and Entergy by means of false representations, pretenses and promises.

It was part of her scheme to defraud Discover Financial Services and Entergy, that on or about May 31, 2008 and June 24, 2008, the defendant, **GERALYN MOORE** represented to Discover Financial Services and Entergy that she was the authorized user of a Discover Card with the number xxxx-xxxx-xxxx-5473, when in truth and in fact she knew this representation was false and that the Discover Card number belonged to M.G.

It was further part of the defendant's scheme to defraud Discover Financial Services and Entergy, that on or about May 31, 2008 and June 24, 2008, the defendant **GERALYN MOORE**, presented Discover Card number xxxx-xxxx-xxxx-5473 to Entergy, for the purpose of fraudulently paying for services that she had used.

On or about the dates listed below, in the Eastern District of Louisiana, the defendant, **GERALYN MOORE** for the purpose of executing and attempting to execute the scheme and artifice to defraud, did knowingly and willfully cause to be transmitted in interstate commerce certain writings, signs, signals, and sounds by means of wire communications when the defendant, **GERALYN MOORE**, used an unauthorized Discover Card number xxxx-xxxx-xxxx-5473 to obtain the following services and property from Entergy:

Count	Date Used	Amount	Payment ID #	Vendor
2	5/31/08	\$402.95	294279463	Entergy
3	6/24/08	\$182.95	299664826	Entergy

The defendant's fraudulent usage of Discover Card number xxxx-xxxx-xxxx-5473 on May 31, 2008 and June 24, 2008 caused two separate signals, signs, writings, and sounds to be transmitted on each date to a data center outside the state of Louisiana, allowing the defendant, **GERALYN MOORE**, to receive services and money by the use of the falsely and fraudulently obtained Discover Card number xxxx-xxxx-xxxx.

In February of 2009, **GERALYN MOORE** admitted to federal agents that she used the Discover card number xxxx-xxxx-xxxx-5473, which belonged to someone else, in order to make purchases of goods and services. She admitted that she used two addresses: P.O. Box 2992 Harvey, Louisiana and 5441 Tusa Dr., Marrero, Louisiana.

In summary, all of the evidence introduced at trial would establish the elements of the offense and prove the defendant's guilt beyond a reasonable doubt.

**READ AND APPROVED:**

\_\_\_\_\_  
GERALYN MOORE (Date)  
Defendant

\_\_\_\_\_  
ROMA KENT (Date)  
Counsel for Defendant

\_\_\_\_\_  
SHARAN E. LIEBERMAN (Date)  
Assistant U.S. Attorney